

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**Carroll Independent School District,**

*Plaintiff,*

v.

**United States Department of Education, et al.,**

*Defendants.*

**Case No. 4:24-cv-00461-O**  
District Judge Reed C. O'Connor

**UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMIT**

1. Pending before the Court is Plaintiff's motion for summary judgment, *see* ECF No. 58, and Defendants' cross-motion for summary judgment and dismissal, *see* ECF No. 64.
2. Pursuant to the parties' joint notice outlining schedule for expedited resolution, *see* ECF No. 56, this Court ordered Defendants to file a Reply limited to 15 pages. *See* ECF No. 57.
3. Defendants respectively request leave to exceed the 15-page limit for their Reply to 25 pages. Given the nature and complexity of the substantive arguments raised in Plaintiff's 37-page Response, *see* ECF No. 77, a 10-page extension is warranted to allow Defendants to effectively reply to Plaintiff's Response.
4. Defendants' counsel conferred with Plaintiff's counsel, and Plaintiff consents to the request.
5. A proposed order is attached.

Dated: September 17, 2024

Respectfully submitted,

BRIAN M. BOYNTON

Principal Deputy Assistant Attorney General

EMILY B. NESTLER  
Assistant Branch Director

*/s/ Pardis Gheibi*

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*Attorney for Defendants*

**CERTIFICATE OF CONFERENCE**

I certify that on September 17, 2024, counsel for Defendants conferred by email with Mathew Hoffman, counsel for Plaintiff, and Mr. Hoffman informed Defendants' counsel that "Plaintiff consents" to the relief requested in the above motion.

/s/ Pardis Gheibi

**CERTIFICATE OF SERVICE**

I hereby certify that on September 17, 2024, I electronically filed this document with the Court by using the CM/ECF system, and that this document was distributed via the Court's CM/ECF system.

/s/ Pardis Gheibi